

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI**

In Re:)
)
Valerie Marie Hatfield, *Debtor*)
) Case No. 15-41990-drd
Christiana Trust, a division of Wilmington Savings Fund)
Society, FSB, as Trustee for Normandy Mortgage Loan Trust,) Chapter: 13
Series 2013-8, by Rushmore Loan Management Services,)
LLC, loan servicing agent for *Creditor*)
)
vs.)
)
Valerie Marie Hatfield, *Debtor*

**SECURED CREDITOR'S OBJECTION TO
CONFIRMATION OF CHAPTER 13 PLAN**

COMES NOW, Christiana Trust, a division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-8, by Rushmore Loan Management Services, LLC, its successors or assigns, a secured creditor and objects to the Chapter 13 Plan for the following reasons:

1. The secured creditor is the holder of a promissory note in the principal sum of \$92,224.53, together with interest, secured by a lien on the real property of the Debtor located at 607 Southwest BB Highway, Centerview, MO 64019.

2. The Debtor's Plan lists the pre-petition arrearage to Christiana Trust, a division of Wilmington Savings Fund Society, FSB, as Trustee for Normandy Mortgage Loan Trust, Series 2013-8, by Rushmore Loan Management Services, LLC, at \$1,407.00. The approximate arrearage that will be listed in the Creditor's Proof of Claim is \$6,630.35.

3. The Debtor's plan understates Creditor's arrearage, therefore violating 11 U.S.C. §1325(b)(2) in that the plan does not provide for curing of the pre-petition default.

WHEREFORE, having fully prayed, Creditor requests that confirmation of the proposed Chapter 13 plan be denied, and for such other and further relief as the Court deems proper.

SOUTHLAW, P.C.
/s/ Ashley B. Osborn
Steven L. Crouch (MBE #37783; EDMO #2903; KSfD #70244)
Wendee Elliott-Clement (MBE #50311; KS #20523)

Ashley B. Osborn (MBE #59427; KS #23272)

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ATTORNEYS FOR CREDITOR

CERTIFICATE OF MAILING/SERVICE

I certify that a true copy of the Attached Pleading was served either electronically or via first class mail on August 17, 2015 upon the following parties:

Valerie Marie Hatfield
607 Southwest BB Highway
Centerview, MO 64019
DEBTOR

Gabriel A. Domjan
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ATTORNEY FOR DEBTOR

Richard Fink
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TRUSTEE

Office of the United States Trustee
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Kansas City, MO 64106
U.S. TRUSTEE

SOUTHLAW, P.C.
/S/ Ashley B. Osborn
Steven L. Crouch (MBE #37783; EDMO #2903; KS Fd #70244)
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